

EXHIBIT 3

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Attorneys for Defendants
 CIGNA HEALTH AND LIFE INSURANCE COMPANY and
 CIGNA BEHAVIORAL HEALTH (n/k/a Evernorth Behavioral Health)

**IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH, CENTRAL DIVISION**

S.F., and E.F., <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> CIGNA HEALTH AND LIFE INSURANCE COMPANY, CIGNA BEHAVIORAL HEALTH, THE SLALOM LLC HEALTHCARE BENEFIT PLAN, AND DOES 1-1000, <p style="text-align: center;">Defendants.</p>	Case No.: 2:23-cv-00213 DAK-JCB DECLARATION OF PAMELA LEY
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I, Pamela Ley, declare as follows:

1. My name is Pamela Ley. I am over the age of 18, and I am fully competent to make this declaration. The statements contained in this declaration are based on my personal knowledge and upon my review of the business records of Cigna Health

and Life Insurance Company ("Cigna") and are true and correct.

2. I am a Senior Operations Supervisor, for Cigna. In that capacity, I am the person responsible for researching and compiling records related to healthcare claims submitted to health benefits plans for which Cigna and/or its affiliates (including Evernorth Behavioral Health, Inc.) provides administrative services.
3. I am personally familiar with and have direct access to business records regarding Cigna's status as a third-party claims administrator to the self-funded employee welfare benefit plan sponsored by Slalom LLC (the "Plan") at issue in this lawsuit.
4. I am also personally familiar with the manner in which Cigna maintains its files and records relating to its contracts for administrative services provided to the Plan.
5. Cigna formerly provided third-party claims administrative services to the Plan pursuant to an administrative services agreement, but that administrative services agreement between Cigna and the Plan terminated, effective December 30, 2020.
6. As of January 1, 2021, Cigna no longer provides any administrative services to the Plan, and Cigna no longer has access to the Plan's account to pay benefits claims submitted to or covered by the Plan, including for claims submitted to the Plan prior to December 30, 2020.

I declare under penalty of perjury under the laws of the United States and the state of Utah that to the best of my knowledge and recollection the foregoing is true and correct.

Executed this 1st day of June, 2023 in Bristol, Tennessee.

By: 
Pamela Ley